

Jimmy E. White  
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Attorneys for Defendants  
Private Valuations, Inc. and  
Adrien Gamache

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA  
ANCHORAGE DIVISION

ROBERT L. RICHMOND,

Plaintiffs,

VS

PRIVATE VALUATIONS, INC. and  
ADRIEN E. GAMACHE.,

Defendants.

Case No. 3:12-cv-\_\_\_\_\_

**NOTICE OF REMOVAL**

TO: THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

This notice of defendants respectfully shows:

1. That on the 31<sup>st</sup> day of July, 2012, and by way of a Complaint dated July 31, 2012, an action was commenced against defendants in the Superior Court for the

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*Richmond v. Private Valuations, Inc. et al.*  
Case No. 3AN-12-8843 CV

State of Alaska at Anchorage, entitled ROBERT L. RICHMOND, Plaintiff v. PRIVATE VALUATIONS, INC. AND ADRIEN E. GAMACHE, Defendants, Case No. 3AN-12-8843 CV. A copy of the Complaint was personally served on defendants at the corporate office in Washington on August 6, 2012.

2. That this notice of removal is being filed pursuant to 28 U.S.C. § 1446(a) and (b) within thirty (30) days after receipt by defendants of a copy of the initial pleading setting forth the claims of plaintiffs against defendants. Copies of all papers found by defendants in the file of the Superior Court for the State of Alaska, Third Judicial District at Anchorage, concerning this action are attached hereto in accordance with 28 U.S.C. § 1446(a):

- A. Complaint dated July 31, 2012;
- B. Case Description Form, undated;
- C. Counsel of Record Sheet, TF-900, undated;
- D. Summons forms to defendants dated July 31, 2012;
- E. Civil Rule 4(f) Affidavit of Service dated August 13, 2012;
- F. Entry of Appearance for Defendants dated August 22, 2012;
- G. Defendants' Demand for Jury Trial dated August 22, 2012;
- H. Answer dated August 23, 2012;
- I. Plaintiff's Demand for Jury Trial;
- J. Initial Pretrial Order;

K. Notice to State Court of Removal of Civil Action dated September 5, 2012.

3. This court has original jurisdiction of this action pursuant to 28 U.S.C. § 1332(a) and this action may be removed to this court pursuant to the provisions of 28 U.S.C. § 1441. This is a civil action where the amount in controversy exceeds \$75,000, exclusive of interest and costs, and there is complete diversity of citizenship between the plaintiff and the defendants.

4. Plaintiff is and was at the time of filing this action, a resident of the State of Alaska, as recited in plaintiff's Complaint.

5. Defendant Private Valuations, Inc. is, and was at the time of filing of this action, a corporation incorporated under the laws of the State of Washington, with its principal place of business in the State of Washington. Defendant Adrien E. Gamache is, and was at the time of filing of this action, a resident of Washington. Since Private Valuations, Inc. is incorporated in and has its principal places of business in a state other than the State of Alaska where the complaint was filed, and Adrien Gamache is a resident of a state other than the State of Alaska, and since the complaint itself seeks damages greater than \$75,000, removal is proper under 28 U.S.C. § 1441(b).

6. This notice of removal is timely because it is brought within thirty (30) days of the earlier of receipt of a copy or service of plaintiffs' Complaint on defendants.

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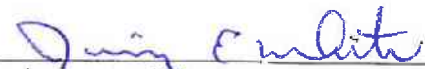
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7. A notice of filing this Notice of Removal will be filed with the Superior Court of the State of Alaska, Third Judicial District at Anchorage, and served upon plaintiff.

8. Defendants will pay all costs and disbursements incurred by reason of removal proceedings hereby brought should it be determined that this case is not removable or is improperly removed.

WHEREFORE, defendants give notice that this action formerly pending in the Superior Court for the State of Alaska, Third Judicial District at Anchorage is hereby removed to this court.

DATED at Anchorage, Alaska, this 5<sup>th</sup> day of September, 2012.



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**VERIFICATION**

UNITED STATES OF AMERICA)

) ss.

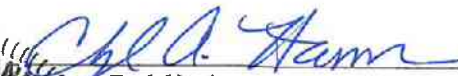
DISTRICT OF ALASKA )

Jimmy E. White, being first duly sworn, deposes and states that he is the attorney for defendants Private Valuations, Inc. and Adrien E. Gamache, that he knows the contents of this notice of removal and that the same are true and accurate to the best of his knowledge and belief; and that he voluntarily executed the foregoing notice of removal and was fully authorized to do so on behalf of Private Valuations, Inc. and Adrien E. Gamache.

  
Jimmy E. White

SUBSCRIBED AND SWORN to before me this 5 day of September, 2012.



  
Notary Public in and for Alaska  
My Commission Expires: 4-28-2015

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served September 5, 2012 via U.S. Mail on:

Gary A. Zipkin  
Guess & Rudd P.C.  
510 L Street, Suite 700  
Anchorage, AK 99501

s/ Jimmy E. White

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